

EXHIBIT C

Civil Action No. 4:20-cv-03709

DECLARATION OF MICHELE ROYER

Pursuant to 20 U.S.C. § 1746, I, MICHELE ROYER, declare as follows:

1. My name is Michele Royer. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.

2. I am a registered voter in Harris County, Texas. On October 20, 2020, I voted using Harris County's drive-thru voting at the Humble Civic Center. I had to show my ID, confirm my address and sign the register before I was permitted to vote.

4. I chose to vote using drive-thru voting because I am a widow with great responsibility to stay healthy and safe from Covid 19 for my young son. As I assist with his virtual learning, only order our groceries for delivery to our home, no longer meet friends or go out to eat, voting in person just seemed a risk to my health. Also, the convenience of staying in my car helped as I wear a prosthetic leg and standing in a possible long line can be quite difficult and painful. Harris County advertised it as an option for voters this year and I believed it was a good option for someone like me.

5. Because of this litigation, I am now worried that my ballot may not be counted even though I did everything the election officials asked of me. I am also seriously concerned that, if this court were to invalidate my legitimate vote, I would have to cast a new ballot to ensure my vote is counted. Because early voting ended, the only way for me to do that would be to go to my polling place on Election Day. But the whole reason I chose to vote early was to avoid that situation. My son's birthday is Election Day of November 3, and early voting has always been my mode of voting to free myself on his special day.

6. Now more than ever, while assisting a home learner, teaching community college online classes both day and evening myself, voting on election day is extremely difficult if not impossible. I have work and parental obligations that would make it difficult to go to the polls and stand in line on Election Day. Moreover, I am very concerned about the risk of being infected with the coronavirus that accompanies standing in line at the polls as well as my physical stamina of standing for long periods of time. That was why I chose the drive-through option in the first place. If I have to go to a polling place on Tuesday to cast a new ballot, I would be forced into a position where I have to choose between my right to vote and my wellbeing of not just myself but of my son.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: November 1, 2020

Michele Royer

Michele Royer

Signature: 
Michele Royer (Nov 1, 2020 23:24 CST)

Email: shelly.royer@yahoo.com